

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HOWARD COHAN,)	
)	
Plaintiff,)	
)	
v.)	No. 15-cv-527
)	
MARRIOTT HOTEL SERVICES, INC.)	Judge Robert W. Gettleman
d/b/a Marriott Fairfield Inn and Suites)	
Lombard,)	Magistrate Judge Michael T. Mason
)	
Defendant.)	

**MOTION FOR ENLARGEMENT OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT
AND TO SCHEDULE A SETTLEMENT CONFERENCE**

NOW COMES Defendant, MARRIOTT HOTEL SERVICES, INC. d/b/a Marriott Fairfield Inn and Suites Lombard ("Marriott"), by and through its attorneys, Gross & Boyle, LLC, and for its Motion for Enlargement of Time to Respond to Plaintiff's Complaint and To Schedule a Settlement Conference, states as follows:

1. On January 20, 2015, Plaintiff filed his Complaint alleging that Marriott has violated Title III of the Americans with Disabilities Act (42 U.S.C. §12101, *et seq.*) ("ADA") by failing provide required van disabled parking spaces, disabled parking signs and pool access.

2. The Complaint and Summons was served on Defendant's registered agent on February 2, 2015, making the due date for its appearance and responsive pleading February 24, 2015.

3. Defendant retained counsel for this matter on February 16, 2015; Defendant and its counsel continue to investigate the facts alleged by Plaintiff and require an additional twenty-one (21) days (until March 17, 2015) to file its response to the Complaint.

4. No prejudice to Plaintiff's interests will result if the requested additional time is granted, and it remains possible that the parties will reach a resolution of this matter in the meantime.

5. Further, given the nature and scope of the allegations of the Complaint, Defendant believes that the most efficient use of the parties' resources is to engage in immediate efforts to settle this matter directly, and if unsuccessful, to enlist the assistance of this Court. Accordingly, Defendant requests that this matter be set for a settlement conference with this Court or assigned to Magistrate Judge Mason for such purposes.

6. Counsel for Defendant has spoken with counsel for Plaintiff about the relief sought in this motion, and counsel for Plaintiff has no objection thereto.

WHEREFORE, Defendant respectfully requests that it be granted until March 17, 2015 to file its response to Plaintiff's Complaint (or such other date the Court deems proper), and that this this matter be scheduled for a settlement conference.

Respectfully submitted,

By: /s/ Mark C. Gross
One of Defendants' Attorneys

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